

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)
ECF Case

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CANTOR FITZGERALD & CO., et al.,

Plaintiffs,

04 CV 7065 (RCC)
ECF Case

v.

AKIDA BANK PRIVATE LIMITED, et al.,

Defendants.
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DECLARATION OF JONATHAN M. GOODMAN IN SUPPORT OF THE
CANTOR FITZGERALD AND PORT AUTHORITY PLAINTIFFS OPPOSITION TO
THE MOTION TO DISMISS OF DEFENDANT SULAIMAN AL RAJHI

Jonathan M. Goodman, Esq. declares under penalty of perjury:

1. I am associated with the law firm of Dickstein Shapiro Morin & Oshinsky LLP, counsel for Plaintiffs Cantor Fitzgerald & Co., Cantor Fitzgerald Associates, L.P., Cantor Fitzgerald Brokerage, L.P., Cantor Fitzgerald Europe, Cantor Fitzgerald International, Cantor Fitzgerald Partners, Cantor Fitzgerald Securities, Cantor Fitzgerald, L.P., Cantor Index Limited, CO2e.com, LLC, eSpeed Government Securities, Inc., eSpeed, Inc., eSpeed Securities, Inc., TradeSpark, L.P.; and the Port Authority of New York and New Jersey, Port Authority Trans-Hudson Corporation, and WTC Retail LLC (collectively, the "Cantor Fitzgerald Plaintiffs") in the above-

captioned matter. This declaration is submitted in support of the Cantor Fitzgerald Plaintiffs' opposition to the motion to dismiss of Defendant Sulaiman Al Rajhi.

2. Attached hereto as Exhibit 1 is a true and correct copy of the November 10, 2004 decision of the United States District Court for the Northern District of Illinois in *Boim v. Quranic Literary Instit.*, No. 00 C 2905 (Keyes, A., Mag. J.) (N.D. Ill. Nov. 10, 2004).

3. Attached hereto as Exhibit 2 is a true and correct copy of the June 13, 2005 decision of the United States District Court for the Southern District of New York in *Presbyterian Church of Sudan v. Talisman Energy, Inc.*, 01 Civ. 9882 (DLC) (S.D.N.Y. June 13, 2005).

4. Attached hereto as Exhibit 3 is a true and correct copy of the transcript of the Congressional Testimony of Dr. Dore Gold, President of the Jerusalem Center for Public Affairs and former Israeli Ambassador to the United Nations, Before the Committee on Governmental Affairs, United States Senate (July 31, 2003), found at www.iwar.org.uk/cyberterror/resources/terror-financing/073103gold.htm.

5. Attached hereto as Exhibit 4 is a true and correct copy of the (Proposed Redacted) Affidavit in Support of Application for Search Warrant (Oct. 2003) of David Kane, In the Matter of Searches Involving 555 Grove Street, Herndon, Virginia and Related Locations, submitted to the United States District Court for Eastern District of Virginia, dated March __, 2002.

6. Attached hereto as Exhibit 5 is a true and correct copy of a newspaper article entitled Douglas Farah and John Mintz, U.S. Trails Va. Muslim Money, Wash. Post. (Oct. 7, 2002), reprinted in SITE INSTITUTE.

7. Attached hereto as Exhibit 6 is a true and correct copy of relevant pages of *The 9/11 Commission Report*, found at <http://www.9-11commission.gov/report/911Report.pdf>.

Dated: New York, New York
June 28, 2005

/s/
Jonathan M. Goodman